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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 12, 1993

9303400

Mr. Cliff Clark
US Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. Clark:

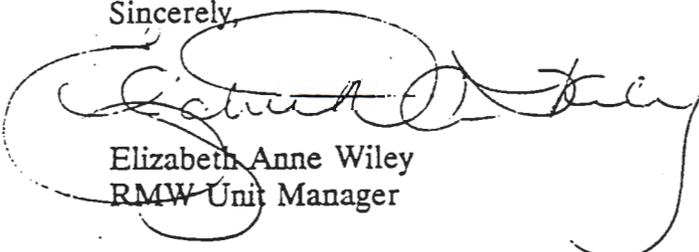
RE: Notice of Deficiency - Hanford Central Waste Complex RMW Permit Application

We have reviewed the Hanford Central Waste Complex-Radioactive Mixed Waste Storage Facility Waste Permit Application Response Table. Enclosed you will find comments in answer to this table.

Comments regarding the Phase V Conceptual Design Report will follow at a later date. Most comments to this table are the usual compliance issues dealing with the Draft Permit and WAC 173-303.

If you have any questions, please call me at (206) 493-9426.

Sincerely,



Elizabeth Anne Wiley
RMW Unit Manager

EA:lj

Enclosures

cc: Becky Austin, WHC/RL
Brett Barnes, WHC
Dan Duncan, USEPA
Rick Pierce, WHC/RL
Steve Wisness, USDOE

Hanford Central Waste Complex Radioactive Mixed Waste Storage Facility Permit
Application Notice of Deficiency
February 16, 1993

These comments in the RMW Permit Application have been accepted by the Department of Ecology:

2, 5, 13, 14, 17, 19, 21, 28, 30, 33, 38, 39, 41, 42, 43, 48, 50, 53, 61, 62, 68, 71, 72, 73, 74, 75, 79, 82, 83, 84, 85, 86, 88, 89, 90, 95, 98, 100, 102, 103, 104, 105, 107, 108, 109, 111, 113, 114, 115, 116, 122, 123, 125, 128, 130, 133, 134, 135, 136, 139, 140, 142, 145, 146, 147, 148, 151, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 164, 165, 166, 167, 168, 169, 170.

The following comments are accepted pending inclusion in the revised text:

1, 6, 7, 11, 12, 15, 16, 18, 22, 27, 32, 34, 36, 37, 40, 45, 49, 51, 52, 55, 56, 58, 59, 60, 70, 76, 78, 93, 96, 97, 101, 117, 118, 119, 120, 121, 126, 129, 131, 132, 138, 144.

Response

3. Ecology Comment: This issue is still being reviewed by Ecology and will be submitted under separate cover.

4. Ecology Comment: Refer to comment number 3.

8. DOE-RL/WHC Response: Text will be revised to read: "Hanford Facility--A single RCRA Facility identified by the EPA /State identification number WA7890008967 that consists of over 60 TSD units conducting dangerous waste management activities. These TSD units are included in the Hanford Facility Dangerous Waste Part A Permit Application (DOE-RL 1988). The Hanford Facility consists of all contiguous land, and structures, other appurtenances, and improvements on the land used for recycling, reusing, reclaiming, transferring, storing, treating, or disposing of dangerous waste. The Hanford facility excludes portions...."

Ecology Comment: From the way this definition is written (page 1-6; line 31), it can be implied that waste from an off-site DOE facility may be considered onsite if it is run by RL. Waste which is going to WIPP might fall under this category. The above definition does not designate the difference between off-site and on-site in regards to transportation of waste. The definition of on-site as is provided in the Hanford Facility draft Site-Wide permit must be used.

9. DOE-RL/WHC Response: Text could be modified in the future if and when Ecology provides direction.

Ecology Comment: Ecology will provide direction regarding class I modifications as soon as more information becomes available.

10. Ecology Comment: Refer to comment 3.

20. DOE-RL/WHC Response: A legal description will be provided when available.

Ecology Comment: Is there a reason why a legal description is not available at this time? Please explain.

23. DOE-RL/WHC Response: Refer to disposition number 3 regarding radioactive contamination. This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.

Ecology Comment: The 616 permit does indeed require sampling of water prior to release to the environment. Since this is a storage area for dangerous and mixed waste, some type of field screening must be provided prior to release to the French drain.

24. DOE-RL/WHC Response: Water is pooled intentionally on the Mixed Waste Storage Pad and the Waste Receiving and Storage Area to permit cleanliness verification before release to the environment.

Ecology Comment: Does "cleanliness verification" mean that the pooled water is sampled to detect contamination? Describe the verification process.

26. DOE-RL/WHC Response: This text is nearly verbatim from the 616 NRDSWF Dangerous Waste Permit Application, which has been accepted by Ecology. This information is located in Chapter 4.0, Section 4.1.1.8.

Ecology Comment: Information on spills and discharges will comply with the requirements of WAC 173-303-145. This must be indicated in the section on spills and discharges.

29. DOE-RL/WHC Response: The Building Emergency Plan for the Central Waste Complex is updated at least annually. To reference sections could require unnecessary modification(s) to the permit. Refer to Table of Contents in the Building Emergency Plan for the Central Waste Complex for location of the information.

Ecology Comment: Ecology requires that the specific section for the mitigation and control of spills be noted. Editorial changes are not permit modifications.

31. DOE-RL/WHC Response: There is no regulatory requirement for this condition. This condition has been inappropriately written to impose requirements for onsite waste movement. There are no shipping requirements for onsite waste movement. Waste handling at the Hanford site is consistent with that which is protective of human health and the environment.

Ecology Comment: Ecology will regulate all tracking mechanisms at the site. Ecology will concur only if the established tracking mechanisms are similar to those which are stated in Hanford Site Wide Draft Permit condition II.Q.

33. DOE-RL/WHC Response: This paragraph is addressing the shipment of onsite transfers, which are accompanied by waste tracking forms, not an EPA manifest. Refer to disposition number 31.

Ecology Comment: It is not clear from the paragraph written regarding waivers, that this exemption is provided only for onsite transfers of waste. Be more specific so that the paragraph on waivers will not be misconstrued.

35. DOE-RL/WHC Response: Refer to disposition number 3

Ecology Comment: Refer to comment number 3.

44. DOE-RL/WHC Response: Refer to disposition number 31.

Ecology Comment: Please indicate if the WHC waste acceptance criteria meets WAC 173-303-300 and 40 CFR criteria for waste analyses. These are the regulations which apply to this section of the permit application.

47. DOE-RL/WHC Response: Refer to disposition number 32.

Ecology Comment: Please denote if the waste acceptance criteria specified by WHC meets the WAC and 40 CFR requirements. Provide the document or copies of the section which demonstrate that this document is in compliance with State and Federal regulations.

54. DOE-RL/WHC Response: Waste packages are segregated according to storage categories to prevent accidental commingling of incompatible waste. Each waste package is assigned to only one storage category (e.g., flammable storage, oxidizer storage, acid storage, caustic storage.....

Ecology Comment: The above stated is fine, except that on page 3-12, line 31,

there is a reference to figure 3-1 as being a compatibility chart. The chart listed is a 1985 Coast Guard document. This list is outdated, and USCG compatibility references are found in 46 CFR, 49 CFR and the Federal Register (HM-181). New compatibility charts and regulations were promulgated in 1991. These rules are in effect at this time, and must be complied with by 1995. This text must be modified to incorporate the updated requirements.

57. DOE-RL/WHC Response: Text will be revised to read: "ASTM D2234-89".

Ecology Comment: The DOE response has a typo. The correct revision is ASTM D2234-86. Please correct.

63. DOE-RL/WHC Response: Text will be revised to provide additional information on the handling of containers which are poorly handled (e.g. weathered or deteriorated) or have limited verification (e.g., head gas analysis, document review).

Ecology Comment: Please state how all State (WAC 173-303) and Federal (49 CFR) requirements regarding labeling and waste testing of drums will be followed.

64. DOE-RL/WHC Response: Mixed waste containers are not stored on the Waste Receiving and Staging Area. Mixed waste will remain on the truck(s) if a problem is detected on the waste tracking forms or if an inspection reveals a problem with the containers.

Ecology Comment: WAC 173-303-395 (4) clearly states that loading and unloading areas must be designed, constructed, operated and maintained to contain spills and leaks that might occur during loading and unloading. Some type of containment is necessary in the staging area in case of accidental leaks during operations.

65. DOE-RL/WHC Response: Pallets contaminated from a spill or release of waste will be treated as waste accordingly. Pallets will be removed and segregated for storage and/or disposal based on the nature of the contaminant(s).

Ecology Comment: How will the structural integrity of the pallets be determined if a spill occurs. If contaminants from a spill are at such low levels that disposal of the pallet is unnecessary, what precautions are taken to ensure that the pallets will be sturdy enough to continue to bear the weight of the drums.

66. DOE-RL/WHC Response: Refer to chapter 4.0, section 4.1.1.7.

Ecology Comment: This section is not detailed enough in explaining how spilled

wastes will be sampled and/or treated. Please cite in section 4.1.1.7 or 4.1.1.8 a reference to the Building Emergency Plan, section 4.2-Identification of Hazardous Materials.

67. DOE-RL/WHC Response: As per the revised WAC 173-303 requirements, leaks or spills to an engineered secondary containment system no longer need to be reported.

Ecology Comment: Ecology is following the draft Hanford Site-Wide Permit, section II.A.3. regarding spills, and WAC 173-303-145 (2) (c) (ii). All spills in excess of 10 gallons to secondary containment shall be reported to Ecology.

69. DOE-RL/WHC Response: Refer to disposition number 23.

Ecology Comment: Visual inspection of water is an inefficient form of examination for contaminants, unless searching for particulate contamination. Not all contaminants exhibit visual signs. Contamination by unknown constituents can only be detected by analytical processes. Verification analyses must be performed to determine if contaminants are present.

77. DOE-RL/WHC Response: Text will be revised. Chapter 6.0, Section 6.4.4 incorrectly states that the loss of power would result in deactivation of the fire alarms. The fire alarm systems are equipped with battery backup capabilities that automatically will operate should there be a loss of normal electrical power.

Ecology Comment: If a loss of power does not affect the fire alarm system, why then is this stated? Does the battery backup system automatically engage when a loss of power results, or does it need to be manually engaged? If the system is automatic, this must be stated in the Permit Application.

79. Ecology Comment: This comment was referred to EPA.

80. DOE-RL/WHC Response: Refer to disposition number 54.

Ecology Comment: Refer to comment number 54.

81. DOE-RL/WHC Response: Refer to disposition number 72.

Ecology Comment: The inspection checklist for the Central Waste Complex must be consistent with the 616 NRDWSF permit application.

87. DOE-RL/WHC Response: The referenced drawing has been revised with an updated version. Refer to attached Building Emergency Plan for the Central Waste Complex.

Ecology Comment: The revised version of the Building Emergency Plan displays a totally different drawing than that indicated in the original version. Was the original drawing deleted?

91. DOE-RL/WHC Response: The types of waste might be specified to a point, but the types of waste change constantly with shipments. While individual structures are designed and labeled as to what waste types (refer to disposition 54) the structures contain (refer to figures in attached Building Emergency Plan for the Central Waste Complex), the building emergency director's best source for delineating actual substances and amounts is the shipping manifests for offsite shipments or waste tracking forms for waste moved onsite.

Ecology Comment: The manifests will contain the type of waste which is received at the site, but where will the information be kept on the specific area where these wastes are stored? Is there a log book or computer system which will furnish this information? This information must be easily accessed in case of an emergency situation.

92. DOE-RL/WHC Response: Sampling methods will be listed in the next revision of the Building Emergency Plan for the Central Waste Complex. Currently, sampling is conducted in accordance with WAC 173-303-110, "Sampling and Testing Methods", and SW-846, "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods". Refer to chapter 3.0 of the HCWC-RMW Storage Facility Dangerous Waste Permit Application.

Ecology Comment: Methods for aqueous samples must be included in the revision to the Building Emergency Plan.

94. Ecology Comment: The QA/QC plan in the Permit is consistent with EPA documents which are currently in existence. If RL is in compliance with all EPA QA/QC requirements as specified for methods used, there should be no problem with RL to comply with the QA/QC plan as stated. The QA/QC plan refers only to sampling and analyses operations. The QA/QC specified in the permit are basic analytical procedures. These procedures are normally performed, and the permit requires that these procedures be documented. The reason for documentation is so that Ecology can perform a data validation on data packages coming from laboratories to ensure compliance to EPA protocols. RL must comply with the Site-Wide Permit dated January 15, 1992 on all QA/QC requirements.

99. DOE-RL/WHC Response: Text will be modified to read , "radioactive and/or mixed waste" when the Building Emergency Plan for the Central Waste Complex is revised.

Ecology Comment: The original question stated that the definition of hazardous material was not clear. Please provide a more detailed explanation of hazardous waste.

106. DOE-RL/WHC Response: Text will remain unmodified.

Ecology Comment: Although the text will remain unmodified, the names of the emergency coordinator and the alternates be must submitted to the Occurrence Notification Center and Ecology.

110. DOE-RL/WHC Response: Refer to disposition number 6.

Ecology Comment: Refer to comment 106.

124. DOE-RL/WHC Response: Refer to disposition number 123 for response to first portion of the comment. Refer to disposition number 3 regarding the use of a continuous air monitor system. Continuous air monitor systems in the Low-Flash-Point Mixed Waste Storage Modules have been considered unnecessary and will be removed in the near future.

Ecology Comment: It is unreasonable to expect someone to hold their breath while running to an area which is one barrier away from the affected area of a release. If personnel are in an area where the potential exists for a release of hazardous material, protective gear such as face masks with respirators, should be carried at all times. This will ensure some type of protection in the event of a release, and if the nearest barrier is .25 mile or more away, personnel involved will have a better chance of escape.

127. DOE-RL/WHC Response: Refer to disposition number 106.

Ecology Comment: Refer to comment 106.

137. DOE-RL/WHC Response: The sentence will be revised to read: "Spills and other unusual occurrences are required to be handled promptly and to be well documented." Also, to be consistent with the wording of the 616 NRDWSF Dangerous Waste Permit Application, the following text will be added: "The RMW Storage Facility is not anticipated to become extensively contaminated (the use of the word contaminated refers to contamination by dangerous chemicals regulated by Ecology); therefore, the closure approach will be clean closure.

Ecology Comment: The sentence on line 10 needs to be deleted. It cannot at this time be determined if the RMW storage facility is a clean, well-maintained storage unit. Ecology agrees with the change to line 12, but delete line 10.

141. DOE-RL/WHC Response: Text will be revised. Section 11.1.4.4.1 will be deleted. Also, the following sentence on page 11-4, lines 36 through 37 "verification of the storage building will involve sampling of the walls and floors" will be deleted.

The following text will be added to Section 11.1.4.4: "The walls of the storage buildings are not expected to be contaminated with dangerous waste. Any material spilled in the RMW Storage Facility is removed and verification samples are taken to ensure that no residue remains."

Ecology Comment: Will sampling the surface of suspected contaminated walls be conducted during the closure process? It cannot be assumed that the walls will not be contaminated. Dependant upon the extent of a possible spill and type of contaminants involved, some analytes may penetrate the walls of the complex. Some sort of sampling plan for these areas must be employed to assure maximum protection of health and the environment and minimum accumulation of waste. The specific procedures for this sampling plan must be submitted for approval by Ecology.

143. DOE-RL/WHC Response: Refer to disposition number 94.

Ecology Comment: Ecology requires that all clean closure data deliverables be comparable to those provided by laboratories conducting CLP analyses. These deliverables are required so that Ecology can ensure that the lab has followed all appropriate measures during analyses, and a data validation can be conducted if deemed appropriate.

149. DOE-RL/WHC Response: Text will remain unmodified. Refer to disposition number 3.

Ecology Comment: All components which are shown on Page F11-1 clearly indicate that a radiation survey is performed prior to decontamination. Why is the asphalt pad exempt from this requirement? The asphalt pad must also be surveyed to determine if there is any radioactivity present.

150. DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.

Ecology Comment: Although this text is verbatim from the 616 permit, as written, the sentence is out of context. This sentence states that cleanup operations are complete when they have been initiated. Rewrite the sentence to show that cleanup operations are underway.

152. DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application.

Ecology Comment: Regardless of the fact that this is written verbatim from the 616 permit, "outside the Hanford Facility" is unacceptable. WAC 173-303-360 states that whenever there is a possible hazard to human health or the environment, the appropriate local, state and federal officials must be contacted. There is nothing that states this should only be done when this occurs outside of the facility. Delete "outside the facility".

163. Ecology Comment: It is stated in the operating record section of recordkeeping, that report records are included. Does this include the "required notices" which are a requirement of WAC 173-303-290. If not, where are the required notices kept that are specified by WAC 173-303-290.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: E. A. Wiley, Ecology Addressee: C. Clark, RL Correspondence No.: Incoming: 9303448

Subject: NOTICE OF DEFICIENCY - HANFORD CENTRAL WASTE COMPLEX RMW PERMIT APPLICATION

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: E. A. Wiley, Ecology Addressee: C. E. Clark, RL Correspondence No.: 9303400

Subject: NOTICE OF DEFICIENCY - HANFORD CENTRAL WASTE COMPLEX RMW PERMIT APPLICATION

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		R. C. Bowman	H6-24	X
		B. J. Broomfield	N3-13	X
		G. D. Carpenter	H6-30	
		T. M. Greager	G6-47	X
		W. H. Hamilton Jr.	N3-10	X
		D. G. Hay	T4-05	X
		G. W. Jackson, Assignee	H6-21	
		K. D. Johnson	H5-33	X
		R. J. Landon	H6-22	X
		R. E. Lerch	B3-63	
		D. R. Lucas	G6-46	X
		P. J. Mackey	B3-15	X
		J. B. Maier	T4-06	X
		M. M. McCarthy	N3-13	X
		H. E. McGuire, Level 1	B3-63	
		E. M. Megahad	T4-03	X
		S. H. Norton	N3-14	X
		R. D. Pierce	N3-13	X
		D. B. Powell Jr.	T4-03	X
		S. M. Price	H6-23	X
		D. R. Pyzel	T4-04	X
		R. J. Roberts	N3-13	X
		F. A. Ruck III	H6-23	X
		J. A. Swenson	G6-45	X
		L. W. Vance	H4-16	X
		H. E. Wellsfry	G6-47	X
		EDMC	H6-22-08	X
		RCRA File/GHL	H6-23	X
		BMB File/LB	H6-24	X

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